

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

vs.

ZORAIDA RIVERA-MARTINEZ,
Defendant.

CRIMINAL NO. 25-573 (M)

**MOTION REQUESTING ORDER WAIVING SPEEDY INDICTMENT AND
SPEEDY TRIAL**

TO THE HONORABLE HECTOR R. RAMOS
UNITED STATES MAGISTRATE JUDGE
FOR THE DISTRICT OF PUERTO RICO:

1. On June 17, 2025, Ms. Zoraida Rivera-Martinez was charged via complaint with a violation of 18 U.S.C. § 876). (DE-1).
2. During the initial appearance, and at the request of both parties, Ms. Rivera-Martinez was released with conditions that included her husband being a third-party custodian and that she continue in out-patient, mental health treatment including continuing to participate in treatment with her psychiatrist, Dr. Mario Gonzalez.
3. Ms. Rivera-Martinez has complied with this condition and will continue to participate in treatment. She is currently taking his prescribed medication and residing at her residence with her husband (all in compliance with his conditions of release). She is responding well. She has been in communication with the undersigned counsel and indicates she will appear as directed for all meetings.
4. The parties are actively discussing possible resolutions. It is the hope and intent of the parties that this matter need not be referred to the grand jury for further proceedings. Nevertheless, the government would like Ms. Rivera-Martinez to continue receiving treatment and show a commitment to managing her conditions over a longer period.

5. In light of the foregoing, Ms. Rivera-Martinez requests this Court toll the speedy trial and speedy indictment/information clock, *see* 18 U.S.C. § 3161(b), for a period of 90 days. In addition, the parties request this Court to make a finding on the record “that the ends of justice served by taking such action[s] outweigh the best interest of the public and the defendant in a speedy trial” and a speedy indictment/information. 18 U.S.C. § 3161(h)(7)(A) (“No such period of delay resulting from a continuance granted by the court in accordance with this paragraph shall be excludable under this subsection unless the court sets forth, in the record of the case, either orally or in writing, its reasons for finding that the ends of justice served by the granting of such continuance outweigh the best interests of the public and the defendant in a speedy trial.”).

6. Ms. Rivera-Martinez has been advised of her right to both a speedy indictment and speedy trial and has discussed these rights with undersigned counsel. She has no objection to tolling the applicable periods for a period of 90 days.

7. The parties will remain in communication and update the Court prior to the completion of the requested 90-day tolling period.

8. This request is made in good faith and not for purposes of delay.

WHEREFORE, the Defendant, Zoraida Rivera-Martinez, respectfully requests this Honorable Court take notice of the information contained herein and grant the request to toll the speedy indictment and speedy trial periods.

I HEREBY CERTIFY that on this date I electronically filed the present motion with the Clerk of Court using the CM/ECF system, which will send electronic notification of said filing to all parties of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 26th day of June 2025.

RACHEL BRILL
Chief Defender
District of Puerto Rico

S/John J. Connors
John J. Connors
Assistant Federal Public Defender
Government No. G01315
241 F.D. Roosevelt Ave.
Hato Rey, P.R. 00918-2441
(787) 281-4922/ Fax (787) 281-4899
Email: john_connors @fd.org


Loraida Rivera-Martinez